

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

ANDREW ALEXANDER, et al.,
on behalf of themselves and all
others similarly situated

Plaintiffs,

vs.

Civil Action No. 4:20-cv-00021

PELICIA E. HALL, et al.,

Defendants.

NOTICE OF DEPOSITION DUCES TECUM

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that Plaintiffs Andrew Alexander, Steven Barnes, Maurice Bishop, Benny Ray Blansett, Jason Bonds, Antonio Boyd, Rayshon Darden, John Barnes, Jarred Baysinger, McKinley Brady, Darkeyus Brown, Hubert Anderson, Christopher Burns, and Cedric Calhoun will take the oral depositions, deces tecum, pursuant to Fed. R. Civ. P. 30, before a notary public or some other officer authorized by law to administer oaths of the individuals at the times and locations indicated as follows:

Marshal Turner	Thursday, May 11 2023 9:30 a.m.	Brunini Law Offices
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Tim Morris	Friday, May 12, 2023 9:30 a.m.	Brunini Law Offices
Jeworski Mallett	Friday, May 12, 2023 1:30 p.m.	Brunini Law Offices
Verlena Flagg	Tuesday, May 16, 2023 9:00 a.m.	Parchman Courtroom
Earnest King	Tuesday, May 16, 2023 12:00 p.m.	Parchman Courtroom
Brenda Cox	Tuesday, May 16, 2023 3:00 p.m.	Parchman Courtroom
Marylen Sturdivant	Wednesday, May 17, 2023 9:00 a.m.	Parchman Courtroom
Caren Webb	Wednesday, May 17, 2023 12:00 p.m.	Parchman Courtroom
Peggy Lathan	Wednesday, May 17, 2023 3:00 p.m.	Parchman Courtroom
Stanley Flagg	Thursday, May 18, 2023 9:00 a.m.	Parchman Courtroom

Laquita Meeks	Thursday, May 18, 2023 12:00 p.m.	Parchman Courtroom
Audrey Fields	Friday, May 19, 2023 9:00 a.m.	Parchman Courtroom
Leather Williams	Friday, May 19, 2023 12:00 p.m.	Parchman Courtroom
Claude Lee	TBD ¹	TBD
Terry Haywood	TBD	TBD
Wendell Banks	TBD	TBD
Olivia Westmoreland	TBD	TBD
Lee Simon	TBD	TBD
Jewel Morris	TBD	TBD
Tommy Taylor	TBD	TBD
Pelicia Hall	TBD	TBD

The depositions continue at said places from day to day until completed. The deponents shall bring all documents and tangible things in their possession, custody, or control meeting the definitions in the attached **Exhibit A**.

¹ All deponents whose deposition date, time and location are listed as 'TBD' have not been secured by Defendant nor has Defendant provided permission for Plaintiff to independently secure their depositions where the Defendants have claimed the deponents are represented by Defendant's counsel.

You are hereby notified to appear and to take part in said deposition as you deem proper.

DATED: May 15, 2023

Respectfully submitted,

OLIVER LAW GROUP P.C.

/s/Alyson Oliver

OLIVER LAW GROUP PC

Attorneys for Plaintiffs

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**Pro hac vice admission*

/s/Arthur Calderón

Arthur Calderón

CALDERÓN LAW

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CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2023, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties that are CM/ECF participants in this action.

OLIVER LAW GROUP, P.C.

By: /s/Alyson Oliver
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**Pro hac vice admission*

EXHIBIT A

For time periods February 7, 2017 through current:

1. Complaints, Reports and Investigations: CID reports and investigations; Reports or memorandums regarding gang activities at Parchman Unit 29, Parchman generally; Investigations, and/or reprimands into staff related to contraband or gang activities; Reports or complaints of “extortion”; reports or requests for protective custody and all associated investigations; Reports, complaints, investigations, and/or reprimands related to excessive or unreasonable applications of force against incarcerated persons; Reports, complaints, investigations, and/or reprimands related to staff negligence or incompetence; Inspections, reports, or investigations related to the kitchen and food services at Parchman Unit 29; ARPs filed (all steps and responses); Reports of violence, fights, stabbings, fires, etc.; Letters, complaints, or “grievances” sent to Defendants by any person incarcerated at Unit 29 or their representative and/or agent; All complaints from staff at Unit 29; Reports regarding fires or smoke in the Unit 29 buildings; Reports of use of force causing death or serious bodily injury and/or discharge of firearms; Reports regarding forensic inspections of cell-phones taken from prisoners; Rosters showing the number and name of prisoners incarcerated at Parchman Unit 29.

2. Personal Financial Information: Time sheets/work assignments; Bank statements and tax returns; Records for Cashapp, Venmo, Greendot apps.
3. Policies and Procedures: Policies or procedures related to staff safety for Parchman generally and/or Unit 29 specifically; Policies and procedures related to screening staff for potential gang affiliations; Policies related to searches of prisoners, staff, visitors, cells, and common areas; Policies related to dealing with riots or disturbances.
4. Maintenance Records/Invoices: Invoices, time sheets, billing notes, or other documents related to maintenance work at Unit 29; Invoices, time sheets, billing notes, or other documents related to pest control work at Unit 29; Invoices and/or other documents demonstrating the amount of food used by the kitchen.